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7	

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MELINDA R. LECOURT

Plaintiff,

VS.

EQUIFAX INFORMAITON SERVICES LLC, TRANSUNION, LLC; and AMERICAN EXPRESS COMPANY,

Defendants.

Case No.: 2:20-cv-00930-APG-EJY

STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
AMERICAN EXPRESS NATIONAL
BANK TO FILE RESPONSE TO
PLAINTIFF'S COMPLAINT [ECF NO. #1]
[FIRST REQUEST]

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff, MELINDA R. LECOURT, and Defendant, AMERICAN EXPRESS NATIONAL BANK (incorrectly designated in the Complaint as "American Express Company") (hereafter "AMEX"), by and through their undersigned counsel, that Defendant AMEX may have an additional time within which to answer or otherwise respond to Plaintiff's complaint [ECF No. 1], which was served on Defendant on May 28, 2020.

Therefore, the parties agree that the last day for AMEX to answer or otherwise respond to Plaintiff's complaint is Monday, July 20, 2020.

This request is made in good faith and not for the purpose of undue delay. This document is being electronically filed through the Court's CM/ECF System. Accordingly, counsel for Defendants hereby attests that (1) the content of this document is acceptable to all persons required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document and

Case 2:20-cv-00930-APG-EJY Document 11 Filed 06/16/20 Page 2 of 2

1	has authorized defense counsel to affix his electronic signature hereto; and (3) a record supporting		
2	this concurrence could be made available if so ordered by this Court.		
3	Dated this 15th day of June, 2020.		
4			
5	Respectfully submitted,		
6			
7	REID RUBINSTEIN & BOGATZ	KIND LAW	
8			
9	By: /s/ Kerry E. Kleiman, Esq.	By: /s/ Michael Kind, Esq. (12002)	
10	I. Scott Bogatz, Esq. (3367) Kerry E. Kleiman, Esq. (14071)	Michael Kind, Esq. (13903) KIND LAW	
11	REID RUBINSTEIN & BOGATZ 300 South Fourth Street, Suite 830	8860 S. Maryland Pkwy., Suite 106 Las Vegas, Nevada 89123	
12	Las Vegas, Nevada 89101 Attorneys for Defendant	George Haines, Esq. (9411)	
13	American Express National Bank	HAINES & KRIEGER, LLC 8985 S. Eastern Ave. Suite #350 Las Vegas, NV 89123	
14		Attorneys for Plaintiff	
15			
16			
17			
18		<u>ORDER</u>	
19	IT IS SO ORDERED.		
20			
21	DATED this 16th day of June, 2020.		
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24		UNITED STATES MAGISTRATE JUDGE	
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27			
20	II		